

Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017 covering the prior calendar year 2017.

1. Date filed: February 10, 2018
2. Name of company(s) covered by this certification: Triton Networks
3. Form 499 Filer ID: 828684
4. Name of signatory: Robert W. House
5. Title of signatory: President/CEO
6. Certification:

I, Robert W. House, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

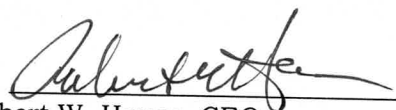
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



By: Robert W. House, CEO

Date Signed:

2/9/2018

Attachments: Accompanying Statement explaining CPNI procedures

47 C.F.R. § 64.2009 Safeguards required for use of customer proprietary network information.

Triton Networks has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

All Triton sales and order processing personnel are trained as to when they are and are not authorized to use CPNI. These procedures are committed to writing, executed by the employees, and the executed copy is placed in the employee's folder. Triton has escalation procedures in place for disciplinary action if the CPNI procedures are not carried out.

Triton Networks maintains records, electronically or by hard copy, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. These record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Triton shall retain the records for a minimum of one year.

Once annually a supervisory review process occurs regarding Triton's compliance with the rules in this subpart for outbound marketing situations. Records are reviewed to insure accuracy during outbound marketing campaigns. Triton sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

Triton has an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are outlined above.